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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

2023 FEB 23 PM 3: 34

UNITED STATES OF AMERICA,

Plaintiff,

VS.

MELISSA CAUDILL,

Defendant.

CASE NO

JUDGE

INFORMATION

18 U.S.C. § 1344(2)

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1

(Bank Fraud)

At all times relevant to this Bill of Information:

- 1. The Defendant, **MELISSA CAUDILL**, was employed by First Knox National Bank ("First Knox"), a division of Park National Bank, Newark, Ohio, in the Southern District of Ohio.
- 2. From January 1999 through February 2019, Defendant **MELISSA CAUDILL** was employed at First Knox in various positions, including bank teller, customer service representative, and consumer and mortgage lender.
- 3. Defendant **MELISSA CAUDILL** maintained personal checking and savings accounts at the bank. Defendant **CAUDILL**'s mother, also maintained a checking account, a savings account, and a home equity line of credit account at First Knox.
- 4. Husband and wife, B.H. and P.H., were long-time customers of First Knox and maintained various accounts at the bank. Defendant **MELISSA CAUDILL** had a banking relationship with B.H. and P.H. since 2004.

5. First Knox is a financial institution insured by the Federal Deposit Insurance Corporation.

The Scheme to Defraud

- 6. Beginning on or about December 10, 2014, and continuing until on or about January 7, 2019, Defendant MELISSA CAUDILL, in the Southern District of Ohio, knowingly executed and attempted to execute a scheme to obtain money, funds and property under the control of First Knox, a federally insured financial institution, by means of false or fraudulent pretenses, representations or promises, to wit: the Defendant executed a scheme whereby she withdrew \$82,950.00 from the First Knox accounts of B.H. and P.H. for her own personal use.
- 7. It was part of the scheme that Defendant MELISSA CAUDILL prepared numerous withdrawal tickets from one of P.H. and B.H.'s accounts, that neither B.H. nor his wife had signed, withdrew the cash, then deposited the entire amount, or some portion of the cash, into her personal checking or savings accounts.
- 8. It was part of the scheme that Defendant **MELISSA CAUDILL** prepared numerous withdrawal tickets from one of P.H. and B.H.'s accounts, that neither B.H. nor his wife had signed, withdrew the cash, then deposited the entire amount, or some portion of the cash, into her mother's checking account or home equity line of credit account.
- 9. It was further part of the scheme that Defendant MELISSA CAUDILL prepared at least one withdrawal ticket, with the forged signature of B.H., withdrew the cash, then deposited the entire amount, or some portion of the cash, into an account associated with Defendant CAUDILL.

10. It was further part of the scheme that Defendant **MELISSA CAUDILL** obtained numerous withdrawal tickets that neither B.H. nor his wife signed, with no preparer indicated, withdrew the cash, then deposited entire amount, or some portion of the cash, into an account associated with Defendant **CAUDILL**.

Execution of the Scheme

11. On or about the date set forth below, in the Southern District of Ohio, Defendant **MELISSA CAUDILL**, for the purpose of executing and attempting to execute the scheme described above, knowingly initiated the transaction listed below, among many others, for the listed amount, from the accounts of P.H. and B.H. for her own personal benefit thereby depriving First Knox of money, funds and property under its custody and control:

COUNT	DATE	WIRE COMMUNICATION
1	1/14/16	Withdrawal of \$1,000 from the First Knox account of P.H. and B.H.
		followed by \$1,000 deposit into CAUDILL's personal checking
		account at First Knox.

In violation of Title 18, United States Code, Section 1344(2).

KENNETH L. PARKER UNITED STATES ATTORNEY

JESSICA W. KNIGHT (0086615) Assistant United States Attorney

BRENDA S. SHOEMAKER (0041411) Assistant United States Attorney